

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN

UNITED STATES OF AMERICA

Criminal No. 2:23-cr-20381-03

v.

Hon. Gershwin A. Drain

KEVIN SHELL,

Defendant.

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**MOTION TO SEAL UNITED STATES' MOTION AND BRIEF FOR  
DOWNWARD DEPARTURE UNDER U.S.S.G. §5K1.1**

The United States, by its undersigned attorneys, respectfully requests that its Motion and Brief for Downward Departure Under U.S.S.G. §5K1.1 be sealed until further Order of the Court because of the sensitive nature of the memorandum, which details the defendant's significant cooperation. The defendant concurs with this motion.

Respectfully submitted,

/s/ Ruben Martinez, Jr.

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Dated: April 29, 2025

**CERTIFICATE OF SERVICE**

I hereby certify that on April 29, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

s/ Ruben Martinez, Jr.  
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